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May 7, 2025

BY ECF

Hon. P. Kevin Castel (by ECF)
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Alvarez v. City of New York
Civ. No.:22-CV-08689 (PKC)

Dear Honorable Judge Castel:

The undersigned represents Plaintiff in the above-referenced action. I write with consent from defense counsel Ms. Carolyn K. Depoian. The parties have been actively exchanging discovery however, at the present time fact discovery is to be completed by July 1, 2025, and Pre-motion letters regarding Rule 56 motion are to be filed by August 1, 2025. Due to an ongoing staffing issue with our Paralegals in our office, we have been struggling to comply with all current deadlines. In light of the above, Plaintiff is respectfully requesting an enlargement of time as follows:

- All fact discovery to be completed by September 1, 2025; and
- Pre-motion letters to be filed by October 1, 2025.

The parties are confident that the above extension of time will allow the parties to complete discovery in a timely manner.

Thanking the Court for its consideration of Plaintiff's request.

Respectfully submitted,
/S/
Rehan Nazrali Esq

cc: (via ECF)